



National Park Service
U.S. Department of the Interior

Pacific West Regional Office

1111 Jackson Street,
Suite 700
Oakland, California 94607

510-817-1428 phone
502-817-1484 fax

Pacific West Regional Office Fax

To: Wayne Yoshioka, Director
Dept. of Transportation Services
City and County of Honolulu

Fax number: 808 523-4730

From: Elaine Jackson-Retondo

Date: May 20, 2009

Pages to follow: 5

Section 106 Historic Resources Effects Determination for the Honolulu High Capacity
Transit Corridor Project

Comments:

Mr. Yoshioka:

We transmittting our comment letter for the above mentioned project by fax to expedite your receipt of our comments. A hard copy of the letter with the enclosures be sent via USPS.

Regards,

Elaine Jackson-Retondo, PhD.
National Historic Landmarks Program Manager

RECEIVED
MAY 21 8:09
CITY OF HONOLULU
DEPARTMENT OF TRANSPORTATION SERVICES

EXPERIENCE YOUR AMERICA

The National Park Service cares for special places saved by the American people so that all may experience our heritage.



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific West Region
1111 Jackson Street, Suite 700
Oakland, CA 94607



H34 (PWR-CR)

MAY 20 2009

Mr. Wayne Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, HI 9681

RE: Historic Effects Report – Honolulu High-Capacity Transit Corridor Project

Dear Mr. Yoshioka:

Thank you for the opportunity to review the April 14, 2009 Historic Effects Report for the Honolulu High Capacity Transit Corridor Project, which we received on April 20, 2009. The National Park Service (NPS) is delegated the monitoring and technical assistance responsibilities by Congress to ensure that National Historic Landmarks (NHL) retain the highest level of integrity. Our responsibilities include review and formal comment on individual proposed changes as well as the cumulative effect of changes through time on NHL properties. These monitoring responsibilities are carried out by NPS staff in the regional offices.

Five NHLs on the Island of Oahu are located within, adjacent to, or in close proximity to the Honolulu High Transit Corridor Project – Pearl Harbor NHL, Commander in Chief, Pacific Fleet (CINPAC) NHL, the USS Bowfin NHL, USS Arizona NHL and the USS Utah. The World War II Valor in the Pacific National Monument, a unit of the National Park System also is within the area of potential effect (APE) for the project. Our participation in this Section 106 consultation process is aimed to fulfill our monitoring responsibilities for the NHLs and to protect the National Monument from adverse effects and impairment. The National Park Service continues to support the concept of a transit system with a primary or alternate route that includes a station with convenient access to the World War II Valor in the Pacific National Monument, USS Arizona Memorial. We look forward to further consultation for answers to our questions and resolution of our concerns.

General Comments and Questions

1. Throughout the document, the physical presence of the guideway system is compared to existing utility poles. This is not an accurate equivalency since the continuous linear elements of the transit system are significantly more massive than power lines in terms of



width, depth, materiality and transparency. This equivalency has potentially led to the minimization of the effect that the system may have on some historic properties within the APE. The assessments need to analyze the impact of the proposed system

2. Throughout the document, there is a statement that there are no audible or atmospheric effects on historic properties from the guideway system, even when the guideway and rail line are immediately adjacent to a historic resource (as close as 30 & 40 feet). The system, as described on page 2 of the document, will use a steel-wheel-on-steel-rail transit technology. It seems unlikely that a steel-on-steel system traveling at high speeds will have no audible or atmospheric effects on properties adjacent to the guideway. It is not enough to merely say that there is no effect. This needs to be demonstrated.
3. The presence of other non-historic properties or previous effects to the integrity of historic resources does not negate the possibility of negative effects from this project. It is not adequate to say that there is no effect or no adverse effect because a past action has had an effect on the integrity of the property. This is particularly true for those properties where the determination of eligibility or National Register status was established after these past interventions, since the property would have been evaluated in light of these changes and found to have adequate integrity to be eligible or to be listed on the National Register of Historic Places. It also is particularly true when assessing the effect on setting. An oversimplification or parsing of the aspects of integrity has, in some instances, resulted in a finding of no adverse effect when it seems that the feeling and association of a site would be effected by the project. We suggest adjusting your method of determining the integrity of a property and the method of assessing the effect as described on pages 19-20.
4. Page 7 – Section 3.1: The APE is defined in the document as *generally one TMK parcel deep from the project alignments but larger around stations and in a few other instances*; and the APE around transit stations is defined *...to include entire blocks or extend 500 feet where blocks are not discernable*. This definition of the APE seems somewhat inconsistent since TMK (tax map key/land parcels) vary in size according to zoning density. Furthermore, it is not always clear when the TMK is used and when the 500-feet is used to determine the APE. Please include, on all maps, at sufficient scale and resolution, clear graphic demarcations of the APE and areas where right of way is required.
5. It also is unclear where and how the development of exclusive right of way is determined. Please include the necessary information to provide a clear understanding.
6. The photographs of historic properties are useful; however, simulations of the transit system, especially in those locations where the historic property is immediately adjacent to the guideway system also are necessary to better understand the visual effects of the system on historic properties.
7. Page 22 paragraph 1: This paragraph states that *because of the scope and magnitude of the Project . . . and because the Project's full future effects cannot be known, this document assumes additional unidentifiable adverse effects to historic properties in the project APE. These presumed adverse effects cannot be adequately documented, but their likelihood shall inform the discussion of appropriate mitigation measures stipulated in a forthcoming Memorandum of Agreement*. This statement is very vague and broad.

- Please identify the types of historic properties that you anticipate may be adversely affected and are covered by this statement.
- If you know that there is the possibility of an adverse effect to a property, that assessment should be included in this document.
- If the properties and adverse effects are likely yet unidentifiable, how do we determine appropriate mitigation?

National Historic Landmarks, National Monuments and Memorials

1. Page 121 Pearl Harbor Introduction, paragraph 1: This paragraph ends with the following statement, *The NHL nomination specifically states that the national significance of Pearl Harbor stems from its continuing function rather than its physical facilities and those physical changes required to support this mission are "necessary, normal and expected."* This statement is misleading for the following reasons:
 - The statement was taken out of context. The point of the statements on Section 7, page 2 of the 1974 nomination is that Pearl Harbor was an active naval base at the time of NHL designation in 1964 and remains active to date; and that in order to continue its mission of supporting the fleet changes will occur. The nomination states that "There is no one water or land use, building or structure whose preservation for historic purposes per se takes precedence over the process of change necessary to maintain the support-of-the-fleet mission of Pearl Harbor." This project is not a Navy-driven effort in support of the fleet; and therefore does not fall into the category of "necessary, normal and expected" change to further the mission.
 - The referenced material is from the older 1974 update rather than the later 1978 update, which eliminates the language that elevates mission over preservation (most likely because this is a management decision and not a normal part of NHL documentation).
 - The Historic Assessment Report elevates a statement that down plays the importance of historic resources while excluding information from both the 1974 & 1978 updates that broaden the setting of the district beyond the NHL boundary. The report further excludes the fact that the 1978 update specifically acknowledges that more than 300 historic buildings have been "identified as of important to major significance" within the NHL boundary. This uneven representation has created a skewed baseline for assessing the effect of the project on the NHL district (see Section 7 page 1 of the 1974 NHL update).
2. Page 121 Pearl Harbor Introduction, Paragraph 2: The section of the paragraph regarding the NHL status of the Commander in Chief, Pacific Fleet (CINPAC) NHL is confusing and arguably irrelevant to the task at hand for the reasons listed below; it should be revised or deleted.
 - CINPAC was designated a NHL in 1987. At the time of the designation, the integrity of the resources was assessed and it was determined that the integrity was sufficient for NHL designation. Any other conclusion would have prevented it from being designated a NHL. Any assessment of the property's integrity for the purposes of reassessing NHL status should use the integrity of the property at the time of designation. It is unclear whether the survey form cited in your report assessed the integrity from the date of designation or from the period of significance. If the assessment does not use the date of designation as the baseline, then the conclusion that the NHL has lost integrity may not be accurate. Please verify the method of assessment and change accordingly.



- The process of de-designating an NHL does not go through the SHPO and NHL status cannot be withdrawn at the state level. CFR 800 Section 65.9(a) states that *National Historic Landmarks will be considered for withdrawal of designation only at the request of the owner or upon the initiative of the Secretary*. To our knowledge, no such request has been made by the Navy and the NPS has not initiated such an action. Delete the statements about removal of the NHL at the state level. They do not make sense and imply an action that cannot be fulfilled.
3. Page 121, Pearl Harbor Introduction, Paragraph 2: There is a statement at the end of the paragraph that the individually designated USS Arizona, USS Utah and USS Bowfin NHLs are located within the boundary of the Pearl Harbor NHL but outside the APE of the project. This statement does not address the concerns previously expressed by NPS regarding potential visual and atmospheric impacts to the setting, feeling, and association of the Monument and the Memorial. During a March 9, 2009 meeting with Faith Miyamoto and other members of the project team in our Oakland regional office, we requested additional studies of these effects. It was our understanding that staff in our Honolulu Office or at the Monument would meet with members of the project team to identify the locations within the monument for further study. To date, we have yet to meet or receive this information. There is no mention of WWII Valor in the Pacific National Monument under the Pearl Harbor section nor is it assessed in a separate section; therefore no assessment has been done regarding the effect of the project on the Monument. An assessment is needed.
 4. Page 122, Pearl Harbor Introduction, Paragraph 1: Please delete the statement that NHLs “. . . rarely, if ever, have received adverse effect determinations.” This statement is inaccurate and irrelevant to the discussion. Many projects at Pearl Harbor have been determined to have an adverse and I am familiar with projects that have resulted in a determination of adverse effect on a NHL; demolition of Doyle Drive at the Presidio of San Francisco and rehabilitation of Soldier Field are two recent examples that come to mind.
 5. Page 123 – Naval Base PH NHL – Historic Effects Document states that the *makai edge of the guideway would generally be approximately 25 feet from the mauka edge of the property's NHL boundary.* The maps included in Appendix A of the Historic Assessment Report show the guideway just outside the NHL boundary for the most part; however, in a few locations the guideway appears to be almost on top of the NHL boundary and the draft EIS shows three possible locations for transit stations within the boundary of Pearl Harbor National Historic Landmark at Aloha Stadium Station, Arizona Memorial Station and Pearl Harbor Naval Base Station and figure.
 - If the guideway is closer than 25, in areas, please make this clear. The phrase *would generally be approximately 25 feet* is too vague.
 - If the placement of stations within the NHL boundary has been eliminated, please make it clear that this option has been eliminated.
 - If the placement of stations within the NHL is still a possibility, then an assessment of the effect should be included in the Historic Assessment Report.
 - Clearly state whether the project assumes a right-of-way easement within the NHL boundary.
 6. Page 123-124, Naval Base PH NHL – We do not concur with the summary assessment that the project will have No Adverse Effect on the Pearl Harbor NHL District. In particular, we